

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

JACK WATSON,

Plaintiff,

v.

BASIC ENERGY SERVICES, INC.,

Defendant.

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Civil Action No. 6:18-cv-461

DEFENDANT BASIC ENERGY SERVICES, INC.'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Basic Energy Services, Inc. (“Basic”) removes to this Court the action brought by Plaintiff Jack Watson (“Plaintiff”) in the County Court at Law No. 2 of Gregg County, Texas.

I. BACKGROUND

On or about August 7, 2018, Plaintiff filed his Original Petition (the “Petition”) against Basic in a case styled *Jack Watson v. Basic Energy Services, Inc.*, in the County Court at Law No. 2 of Gregg County, Texas, as Cause No. 2018-1510-CCL2 (the “State Court Action”). In his Petition, Plaintiff asserts a claim for violation of the Fair Labor Standards Act (the “FLSA”).

Basic was served with citation on August 13, 2018, by certified mail, return receipt requested. This notice of removal, together with all process, pleadings, and orders served on Basic or otherwise on file in the State Court Action, are being filed in this Court within 30 days after the initial service of citation on Basic. This removal is therefore timely under 28 U.S.C. § 1446(b).

A complete list of the parties involved in this case and their counsel, as required by Local Rule CV-81(c)(1) and (3), is as follows:

Name	Party Type	Counsel
Jack Watson	Plaintiff	Matthew R. Patton, IV Texas Bar No. 24002736 316 North Titus Street Gilmer, Texas 75644 (903) 843-3029
Basic Energy Services, Inc.	Defendant	John B. Brown Texas Bar No. 00793412 Jeremy W. Hays Texas Bar No. 24083156 Ogletree, Deakins, Nash, Smoak & Stewart, P.C. 8117 Preston Road, Suite 500 Dallas, Texas 75225 (214) 987-3800

The State Court Action is currently pending in the County Court at Law No. 2 of Gregg County, Texas, Gregg County Courthouse, 101 E. Methvin Street, Suite 303, Longview, Texas 75601.

Pursuant to Local Rule CV-81(c)(2), attached hereto as Exhibit A is an index of the documents filed in the State Court Action. Attached hereto as Exhibit B are copies of all documents filed in the State Court Action, including the docket sheet. Basic's Corporate Disclosure Statement will be filed separately and, in addition, is attached hereto as Exhibit C. A copy of this notice of removal, together with all exhibits hereto, is also being filed with the Clerk of the State Court in which the State Court Action was filed.

II. GROUNDS FOR REMOVAL

In his Petition, Plaintiff assert claims against Basic for violations of the FLSA, 29 U.S.C. § 201, *et seq.* Plaintiff asserts no other claims. Based upon the federal question raised by Plaintiff, this Court has original jurisdiction pursuant to 28 U.S.C. § 1331, and removal is proper pursuant to 28 U.S.C. § 1441.

III. CONCLUSION

For the foregoing reasons, Basic gives notice that the above-styled action, pending in the County Court at Law No. 2 of Gregg County, Texas, as Cause No. 2018-1510-CCL2, is removed to this Court.

Respectfully submitted,

/s/ John B. Brown

John B. Brown

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**ATTORNEYS FOR DEFENDANT
BASIC ENERGY SERVICES, INC.**

CERTIFICATE OF SERVICE

This is to certify that on August 31, 2018, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system of filing, which will transmit a Notice of Electronic Filing to Plaintiff's counsel of record, ECF registrant:

Matthew R. Patton, IV
316 N. Titus Street
Gilmer, Texas 75644
matthew@matthewpattonlaw.com

/s/ John B. Brown

John B. Brown

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